

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ULKU ROWE,

Plaintiff,

-against-

GOOGLE LLC,

Defendant.

No. 1:19-cv-08655 (LGS)(GWG)

**[PROPOSED] ORDER GRANTING DEFENDANT'S
MOTION TO RETAIN DOCUMENTS UNDER SEAL**

Upon consideration of Defendant's Motion to Retain Documents Under Seal, Memorandum of Law in Support, supporting Declarations, and any opposition and reply thereto, it is hereby **ORDERED** that:

1. Google's request to retain the information redacted from GOOG-ROWE-00056990-57014 (submitted in full as Exhibit 12 to the December 17 Letter) under seal because it contains confidential Employee Relations investigations notes is **GRANTED**;
2. Plaintiff is **DIRECTED** to file the redacted version of that document submitted herewith as Exhibit F to the Declaration of Sara B. Tomezsko on the docket, and submit a redacted version of the portions of that document submitted as Exhibit 3 to the December 10 Letter and Exhibit 2 to the Motion to Amend, with redactions conforming to Tomezsko Decl. Exh. F;
3. Google's request to retain Plaintiff's Thrive profile, GOOG-ROWE-00056272 (submitted as Exhibit 5 to Plaintiff's Motion to Supplement), under seal is **GRANTED**;

4. Google's request to retain the information redacted from GOOG-ROWE-00060436-37 (submitted as Exhibit 9 to the December 17 Letter and Exhibit 13 to the Response Letter) under seal is **GRANTED**;

5. Plaintiff is **DIRECTED** to file the redacted version of that document submitted as Exhibit 13 to the Response Letter (ECF 84-13) on the docket in place of Exhibit 9 to the December 17 Letter, which she submitted wholly under seal;

6. Google's request to retain Exhibit 11 to the December 17 Letter, GOOG-ROWE-00017439-40 under seal is **GRANTED**;

7. Google's request to retain the information redacted from the Deposition of Will Grannis, Exhibit 1 to the Response Letter (ECF 84-1) under seal is **GRANTED**;

8. Google's request to retain the job ladders and job families submitted as Exhibits 6, 14, 15, 16, and 19 to the Response Letter under seal is **GRANTED**;

9. Google's request to retain the Engineering Level Guide submitted as Exhibit 11 to the Response Letter under seal is **GRANTED**;

10. Plaintiff is **DIRECTED** to file on the docket: portions of the Vardaman Deposition submitted as Exhibit 5 to the December 10 Letter and Exhibit 3 to the Motion to Supplement; portions of the Ulku Rowe Deposition submitted as Exhibit 4 to the December 10 Letter; portions of the Kevin Lucas Deposition submitted as Exhibit 2 to the December 17 Letter; portions of the Adam Lief Deposition submitted as Exhibit 3 to the December 17 Letter; portions of the Tariq Shaukat Deposition submitted as Exhibit 4 to the December 17 Letter; and portions of the Will Grannis Deposition submitted as Exhibit 7 to the December 17 Letter; and

11. Plaintiff is reminded of her obligations under the parties' Protective Order.

SO ORDERED this _____, 2020.

HON. GABRIEL W. GORENSTEIN
UNITED STATES MAGISTRATE JUDGE